

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TOMMY R. ORTIZ, an individual,

Plaintiff,

v.

WILLIAM EPPERSON, an individual,  
THOMAS ZUBIK, an individual, RHAVEN  
BARTEE, an individual, BRENDA LEE, an  
individual, JANE DOE-MENTAL HEALTH  
TECHNICIAN, an individual, SAMANTHA  
MCDORMAN, an individual, NATHAN  
BOYD, an individual, RALPH CARTER, an  
individual, ALFREDA FLETCHER, an  
individual, LADONALD SCOTT, an  
individual, MICHELLE SANTOS, an  
individual, JOHN DOE-SECURITY GUARD  
1, an individual, and JOHN DOE-SECURITY  
GUARD 2, an individual,

Defendants.

Case No. 18 CV 3385

Hon. Edmond E. Chang

**DHS DEFENDANTS' UNOPPOSED MOTION FOR  
AN EXTENSION OF TIME TO SERVE INITIAL WRITTEN DISCOVERY REQUESTS**

Defendants William Epperson, Thomas Zubik, Samantha McDorman, Nathan Boyd, Ralph Carter, Alfreda Fletcher, LaDonald Scott, and Michelle Santos (collectively "DHS Defendants") by and through their attorney, Kwame Raoul, Attorney General of the State of Illinois, and pursuant to Federal Rule of Civil Procedure 6(b), respectfully requests that this Court extend the time for the parties to serve initial written discovery requests until June 24, 2021. In support of this unopposed motion, DHS Defendants state as follows:

1. The Court granted the parties until June 10, 2021 to serve initial written discovery.
2. Lead counsel for the DHS Defendants recently went on leave and undersigned counsel has been assigned to represent the DHS Defendants in her absence.

3. Undersigned counsel who was recently assigned to this case requires additional time to prepare and serve initial written discovery requests. Plaintiff's counsel also requires an additional week to serve initial written discovery

4. Accordingly, defense counsel requests an extension of time of two weeks, until June 24, 2021, for the parties to serve initial written discovery requests.

5. This motion is not filed in bad faith, for purposes of undue delay, or for any other improper purpose. This is the DHS Defendants' first request for an extension of time to serve initial written discovery requests.

6. The undersigned attorney contacted Plaintiff's counsel about this request for an extension of time, and Plaintiff's counsel does not object to this request.

Wherefore, the DHS Defendants respectfully request that this Court extend the time for the parties to serve initial written discovery requests to June 24, 2021.

Dated: June 9, 2021

KWAME RAOUL  
*Attorney General*  
*State of Illinois*

Respectfully submitted,

/s/ Hal Dworkin  
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